

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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JORDAN RINDGEN,

Plaintiff,

-against-

BROOME COUNTY, BROOME COUNTY
DISTRICT ATTORNEY'S OFFICE, FORMER
BROOME COUNTY DISTRICT ATTORNEY
MICHAEL A. KORCHAK, FORMER CHIEF
ASSISTANT DISTRICT ATTORNEY MARK
LOUGHRAN, ASSISTANT DISTRICT ATTORNEY
ALYSSA CONGDON, ASSISTANT DISTRICT
ATTORNEY AMANDA CRONIN, DISTRICT
ATTORNEY INVESTIGATOR JEFF J. WAGNER,
UNIDENTIFIED JANE/JOHN DOE #1-10 BROOME
COUNTY EMPLOYEES, CITY OF BINGHAMTON,
POLICE CHIEF JOSEPH T. ZIKUSKI, CAPTAIN
CORY MINOR, DETECTIVE AMANDA MILLER,
UNIDENTIFIED JANE/JOHN DOE #1-10 CITY OF
BINGHAMTON EMPLOYEES, HAILEY
DEMKOVICH, and SAMANTHA HERCEG,

Defendants.

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NOTICE OF MOTION

Case No. 3:24-CV-1325 (AJB/ML)

PLEASE TAKE NOTICE that upon the enclosed Memorandum of Law, the undersigned, on behalf of defendant Alyssa Congdon (hereinafter "defendant"), shall move this Court upon submission of the papers before the Honorable Anthony J. Brindisi, U.S.D.J., for (a) an Order pursuant to Federal Rule of Civil Procedure § 12(b)(6) dismissing plaintiff Jordan Rindgen's complaint in its entirety; and (b) for such other and further relief in favor of defendant as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 7.1(a)(1) of the Local Rules of Practice of the United States District Court for the Northern District of New York, any papers to be submitted in opposition to the within motion must be filed with the Clerk of the Court and

served upon counsel for defendant no more than twenty-one (21) days after service of the motion, exclusive of that day.

DATED: January 13, 2025

Respectfully submitted,

HACKER MURPHY, LLP

Yours, etc.,

/s James C. Knox

JAMES C. KNOX, ESQ.
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To: **All Counsel Via ECF**